

Roger G. Trim  
OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.  
2000 S. Colorado Blvd.  
Tower 3, Suite 900  
Denver, CO 80222  
Telephone: 303.764.6800  
Facsimile: 303.831.9246  
Email: roger.trim@ogletree.com

Attorney for Defendant Hospitality Staffing Solutions,  
LLC

**UNITED STATES DISTRICT COURT  
DISTRICT OF MONTANA  
BUTTE DIVISION**

NICHOLAS DOUGLAS; TASHEKA  
BRYAN; JUNIOR HARRIS; MARCUS  
RICHARDS; STEPHANEY SMITH;  
and those similarly situated,

Plaintiffs,

vs.

YELLOWSTONE CLUB  
OPERATIONS, LLC; and  
HOSPITALITY STAFFING  
SOLUTIONS, LLC,

Defendants.

Case No. 2:18-cv-00062-SEH

**DEFENDANT HOSPITALITY  
STAFFING SOLUTIONS,  
LLC’S UNOPPOSED MOTION  
FOR EXTENSION OF TIME  
TO ANSWER OR OTHERWISE  
RESPOND TO COMPLAINT**

Defendant Hospitality Staffing Solutions, LLC (“HSS”), by and through its attorneys, Ogletree, Deakins, Nash, Smoak & Stewart, P.C., hereby moves for an extension of time, up through and including November 18, 2019, within which to file its answer or otherwise respond to Plaintiff’s First Amended Class Action Complaint and Jury Demand (Dkt. #20, “Complaint”). In support thereof, HSS states as follows:

**CERTIFICATE OF CONFERRAL**

Pursuant to D. Mont. L.R. 7.1(c)(1), undersigned counsel for HSS conferred with Plaintiffs' counsel regarding the relief requested herein. Plaintiffs do not oppose the relief requested herein.

**ARGUMENT**

1. HSS' response to Plaintiff's Amended Complaint is currently due on November 8, 2019.
2. Yellowstone Club Operations, LLC, the other defendant in the case, has a deadline of November 18, 2019 to respond to the Amended Complaint.
3. HSS is requesting an extension to respond to the Complaint through November 18, 2019, to allow additional time to prepare its response and so that the responses of both defendants can be filed on the same date.
4. A proposed order is attached and shall be emailed to the Court pursuant to D. Mont. L.R. 7.1(c)(3).

WHEREFORE, Hospitality Staffing Solutions, LLC respectfully requests that it be allowed up to and including November 18, 2019, in which to file its answer or other respond to Plaintiff's Class Action Complaint.

Respectfully submitted this 7th day of November, 2019.

*s/ Roger G. Trim*

Roger G. Trim

ATTORNEY FOR DEFENDANT  
HOSPITALITY STAFFING SOLUTIONS,  
LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on this 7th day of November, 2019, I electronically filed the foregoing **DEFENDANT HOSPITALITY STAFFING SOLUTIONS, LLC'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT** with the Clerk of the Court using the CM/ECF system which will also send notification to the following counsel:

Christopher C. Young  
cyoung@younglawofficepllc.com

David Seligman (*pro hac vice*)  
david@towardsjustice.org

Sarah J. Parady (*pro hac vice*)  
sarah@lowrey-parady.com

*s/ Roger G. Trim*  
Roger G. Trim